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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

September 16, 2021

By ECF & Email

The Honorable Sidney H. Stein United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse New York, NY 10007

Re: <u>United States v. Victor Rivera</u>, 21 Cr. 221 (SHS)

Dear Judge Stein:

cc:

The Government respectfully requests that the conference scheduled for 2:30 p.m. this Monday, September 20, 2021, be adjourned for approximately 30 days. The Government and defense counsel have been communicating about a potential disposition of this case, and expect those discussions to continue in the coming weeks. No agreement is expected, however, before the September 20 conference. The adjournment is requested to give the parties additional time to continue their discussions about a possible resolution.

Given the ongoing plea discussions, the Government also requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in furtherance of the ends of justice, until the next conference.

The defendant, through counsel, consents to the requested adjournment and exclusion of time.

Respectfully submitted,

AUDREY STRAUSS United States Attorney

By: /s/
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Assistant United States Attorneys

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Harlan Protass, Esq. (by ECF & email)